

## SUMMARY OF STATE BURDEN REDUCTION RECOMMENDATIONS AND EPA COMMENTS

### PROGRAM: Office of Prevention, Pesticides, and Toxic Substances

Reporting Requirement	State Recommendation	States	Regional Comments	Office of Prevention, Pesticides, and Toxic Substances Comments
Pollution Prevention Semi-Annual Reports	Change reporting to once at the end of the grant period	NH, FL	<b>R1:</b> NH submits overly detailed reports and can reduce some of the burden by submitting reports at the required level instead.	These reports are key elements of performance measures supporting the P2 program (mirroring and directly supporting strategic targets contained in the 2006 -2011 EPA strategic plan, 5.2.1: Prevent Pollution and Promote Environmental Stewardship). Demonstrating semi-annual and annual progress for P2 performance measures is required by EPA to ensure continued funding of these grants.
Lead, Asbestos, P2 grant applications	Treat as a core program – grants should not be awarded competitively	UT	<b>R8:</b> no comment	--Competitive grant requirements: Competition is a high priority at EPA. EPA's Grants Competition Advocate will consult with OPPTS and the Regions about these specific competition requirements. The regulation for TSCA Section 28 Compliance Monitoring grants was recently revised to allow those grants to be awarded on a non-competitive basis (see 40 C.F.R. 35.312). <i>Lead:</i> Grant competition for Lead is an integral part of OPPTSs effort to focus attention and its limited resources on the most effective efforts to reach the most vulnerable populations. Some lead grants issued under TSCA Section 404(g) are exempt from the Agency's competition policy and are awarded on the basis of a formula and the judgment of the regional office granting the award. <i>P2:</i> P2 is not set up as a block grant program. The P2 grants are set up to be awarded competitively . <i>Asbestos:</i> OPPTS does not award grants for asbestos.